

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division  
In Admiralty**

In the Matter of COEYMANS MARINE  
TOWING, LLC D/B/A CARVER MARINE  
TOWING as Owner and Operator of M/T  
Mackenzie Rose, (IMO No. 8968765) her cargo,  
engines, boilers, tackle, equipment, apparel, and  
appurtenances, etc., *in rem*, petitioning for  
Exoneration from or Limitation of Liability in  
allision with Norfolk and Portsmouth Belt Line  
Railroad Company Main Line Railroad Bridge  
occurring June 15, 2024 in and about the Elizabeth  
River, Virginia.

**Civil Action No: 2:24-cv-00490**

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND  
MEMORANDUM IN SUPPORT**

Claimant/Respondent Norfolk and Portsmouth Belt Line Railroad Company (the “Belt Line”), Claimant/Respondent Evanston Insurance Company (“Evanston”), and Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing (“Petitioner”) (collectively, the “Parties” and each individually, a “Party”), by counsel, hereby jointly move the Court for entry of the attached Stipulated Protective Order, and in support of this Joint Motion, state as follows:

In accordance with pretrial proceedings, Rules 16 and 26 of the Federal Rules of Civil Procedure, and Rule 37 of the Local Rules of Practice for the Eastern District of Virginia, the Parties have met and conferred to agree upon a protective order to handle the disclosure of confidential materials in discovery and at trial (“Proposed Stipulated Protective Order”).

As a result, the Parties attach as **Exhibit 1** an electronically endorsed copy of their Proposed Stipulated Protective Order and request this Court enter that Order in this matter. The entry of the Proposed Stipulated Protective Order will streamline and make the discovery process more efficient while allowing for the disclosure and protection of confidential materials.

WHEREFORE, the Parties, by counsel, request that this Court enter the Parties' Proposed Stipulated Protective Order attached as **Exhibit 1**.

Dated: March 28, 2025

Respectfully jointly submitted,

**NORFOLK AND PORTSMOUTH BELT  
LINE RAILROAD COMPANY**

**COEYMANS MARINE TOWING d/b/a  
CARVER MARINE TOWING, INC.**

Date: March 28, 2025

Date: March 28, 2025

By its attorneys,

By its attorneys,

/s/ Mackenzie R. Pensyl  
James L. Chapman, IV, VSB No. 21983  
W. Ryan Snow, VSB No. 47423  
Mackenzie R. Pensyl VSB No. 100012  
Crenshaw, Ware & Martin, P.L.C.  
150 W. Main Street, Suite 1923  
Norfolk, Virginia 23510  
Telephone: (757) 623-3000  
Facsimile: (757) 623-5735  
[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)  
[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)  
[mpensyl@cmw-law.com](mailto:mpensyl@cmw-law.com)

/s/ James H. Rodgers  
James H. Rodgers, Esq.  
CLYDE & CO US LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
Tel No.: (212) 702-6771  
Fax No.: (212) 710-3950  
[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)  
  
Harold L. Cohen, Esq.  
CLYDE & CO US LLP  
1221 Brickell Ave #1600  
Miami, FL 33131  
Tel No.: (202) 747-5108  
Fax No.: (202) 747-5150  
[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)

Michael Roman, Esq.  
Dawn Johnson, Esq.  
CLYDE & CO US LLP  
30 S. Wacker Drive, Ste 2600  
Chicago, IL 60606  
Tel No.: (312) 635-6971  
Fax No.: (312) 635-6950  
[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)  
[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)

**EVANSTON INSURANCE COMPANY**

Date: March 28, 2025

By its attorneys,

/s/ Zachary M. Jett  
Mark C Nanavati, Esq. (VSB #38709)  
G. Chris Jones, Jr., Esq. (VSB #82260)  
SINNOT, NUCKOLS & LOGAN, P.C.  
13811 Village Mill Drive  
Midlothian, Virginia 23114  
(804) 893-3866 (Nanavati)  
(804) 893-3862 (Jones)  
(804) 378-2610 (Facsimile)  
mnanavati@snllaw.com  
cjones@snllaw.com

Zachary M. Jett, Esq. (VSB #93285)  
BUTLER WEIHMULLER KATZ CRAIG  
LLP  
11525 North Community House Road, Suite  
300  
Charlotte, North Carolina 28277  
(704) 543-2321 (Telephone)  
(704) 543-2324 (Facsimile)  
zjett@butler.legal

